

Joseph Theile

Subject: FW: My input for SB374 Draft regs.
Attachments: SB374-2nd round draft regs. revised dec. 16 2013.docx; Define. sb374 draft regs V.H. requests.docx
Importance: High

From: V & M [<mailto:shootingstar131@embarqmail.com>]
Sent: Monday, December 16, 2013 6:56 PM
To: Marla McDade-Williams
Cc: jqrh
Subject: My input for SB374 Draft regs.
Importance: High

Hello Marla,
I have reviewed the suggested regs. for SB374 and have included as attachments my input in a form I hope is easily interpreted.
Feel free to call at any time,
Vicki Higgins
702-521-2745

SB374: 2nd round Draft Regs.

Sec. 25. #3 . Unclear. Does this mean May 10 through May 20th, 2014?

Sec. 26.3a. If you own the building, is that considered a liquid asset?

Sec. 26.13 "professionally prepared survey". Who prepares/executes survey?

Sec. 30. Without a business license, the establishment would be operating illegally.

Sec. 33. Open operating status before approval?

Sec. 35. 1b What if building is rendered inoperable, IE: fire, flood, robbery, ect..

Sec. 35.b2 5 miles? Contrary to Sec. 35.1b, can establishment move or not? It is unlikely zoning within 5 miles of original address the same.

Sec. 37. Any time? Should be one hour prior, during , and one hour after posted operating hours. Agent is unlikely to be on premises at all times. Unless notified by Division for inspection during posted closed hours.

Sec. 39.b1 As a board member on establishment applications, is a person prohibited from serving on board or committees formed by the NV State Division to assist and evaluate Medical Cannabis Programs?

Sec. 48.5. Registered Agent card renewals. Cost should be reduced for renewal.

Sec. 51. Medicine has to be transported to testing lab somehow.

Sec. 53.2. Prior to entering where Cannabis is present.

Sec. 57.3a Disposal of unusable Medical Cannabis. Define. Who disposes and here disposed?

Sec. 57.3b Quality ID Number. 3b2, 3c1, 3c91, 9e1. Also Sec. 75.3 and 77.4.

Sec. 58.2. Delivery services to registered Cannabis patients cannot exceed 10 ounces in delivery vehicle at any time.

Sec. 60.4. Hipaa violation.

Sec. 61. Sanitizing equipment and surfaces between batches/lots needs to be outlined.

Sec. 62.1a Handicapped access ALL establishments.

Sec. 62.1d Outline sanitizing rules. IE: Frequency, sanitizing solution guidelines and between batches/lots sanitization outlines.

Sec. 64. An establishment cannot be "tagged" as a hazmat cleanup unless deemed necessary by the Division. Hazmat is costly and a waste of time and money on unnecessary "cleanups".

Sec. 71.2. A covered jar does not allow for microscope observation or color, texture or density testing. Destroy by whom? Why not donate to needy patients. Also could be used for concentrates. Return to establishment that originally provided sample.

Sec. 73.2. How are handicapped patients supposed to open their medicine? Alternate, well marked packaging should be considered. I know I could not open what is described.

Sec. 77. Quality Control ID #-THC.

Sec. 78. Quality ID #-THC.

Sec.78.g. Warning: This product MAY have intoxicating effects. Lotions and low thc strains (IE: Charlottes Web) should be the exceptions to requiring this warning label.

Sec.78.3a. MAY have intoxicating effects.

Sec. 78.ai. Quality Control ID #.

Sec. 78.3bc. Not proven research.

Sec. 79. Quality Control ID #

Sec. 79.3a. Not proven research.

Sec. 79.3c. Not proven research.

Sec.86. Quality Control ID #

Sec.87.2. Delete. Things drip while freezing.

Sec. 87.2. Freezer storage 6" off of the floor. Refer to Sec. 112.3.

Sec. 91. Sanitize solution outlines.

Sec. 94. Sanitize between each lot, batch, ect. Outline.

Sec.105.2a. Storage need be 6" off the floor. Refer to Sec.112.3.

Sec. 105.c2. Define "released components".

Sec. 105.c7. Define "Quarantine".

Sec. 106. Are night vision cameras required? Maturing plants need darkness.

Sec.111.2b. All surfaces and equipment sanitized with Division approved solution between each batch.

Sec. 116.1.2. Define "Salvaged/salvaging".

Sec. 116.2b. Inspection by whom?

Sec. 116.3. Salvaged by whom? Quality Control ID # recorded along with "batch", and "lot" numbers.

Sec. 119. Sample sizes are listed for all items except extract/non-solvent. Need sample size defined for all.

Sec. 119. Issue Quality Control ID Number to all tested medicine. List number on all "lots", "batches", and/or ALL products produced from said "lots" and "batches".

Sec. 121. Define "homogenized".

Sec. 121.4. Define "dispose". Define where/how "disposal" is to take place.

Sec. 121.10. Entire "batch" assigned a Quality Control ID Number. ID number follows entire "batch" from Lab to sale.

Sec. 126.d. ADD: Quality ID Number.

Sec. 130. Maximum Fees. Individual jurisdictions/districts should be consistent on the fee schedules.

Sec. 132. DELETE.

Sec. 137. This whole section is going to put the compassionate doctors willing to help patients at an unfair risk. Why put these doctors under any more restrictions for recommending Medical Cannabis than any other medicine they recommend? Do not penalize them. Registered Medical Cannabis Patient numbers will multiply exponentially when Dispensaries open.

Sec. 139. This should change when real time verification is in place. The initially chosen establishment may be found unsuitable for many different reasons, the patient should have choices when it is feasible and Safe verification procedures are in place.

Sec. 142.1a. Why would a written statement be needed by a doctor? The doctor has already filled out the application required by the state.

Sec. 145. THANK YOU.

Vicki Higgins

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Define:

Sec. 57. "disposal of useable marijuana". 3a, 9v, also Sec.121.5. Who disposes and where/how disposed.

Sec. 57. Develop a required "Quality Control ID Number". All Cannabis and cannabis infused products passing quality control testing requirement set by the division shall be numbered with a recorded ID Quality Control. Lab assigns number after testing completed and the number is on each package produced from that batch from lab to sale. 3b2, 3c1, 3c91, 3ve1. Also Sec. 75 #3, and Sec.77 #4.

Sec. 57. "rendered inert". 9 (111)

Sec. 58. #2. 10 oz.? Delivery person may carry only 10 oz. at any one time per delivery route. Clarify.

Sec. 71. "lot". #1, 1a. Flowers from one or more MM plants of the same strain in a quantity of at least 25 lbs. or less. Flowers hold the majority of the weight and medicinal capabilities.

Sec. 103. "homogenized". Also Sec. 113, and Sec. 121.1, and 121.1a.

Sec. 105. "rejected components". 2c2.

Sec. 105. "released components". 2a7, Also 112.4.

Handicapped access at ALL establishments. We want the disabled to be employed as well.